

**SITE ASSESSMENT LETTER REPORT
FOR THE
FORMER STATLER HILTON HOTEL SITE**

Prepared for

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Emergency and Remedial Response Branch
Region 5
9311 Groh Road
Grosse Ile, Michigan 48138

Prepared by

Weston Solutions of Michigan, Inc.
300 River Place, Suite 2800
Detroit, Michigan 48207

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9 January 2003

Prepared By:


Raymond Moffett
START Site Leader

Date: 1/10/03

Reviewed
and
Approved By:

Ray Moffett for
Linda Korobka
START Project Manager

Date: 1/10/03

Table of Contents

<u>Section</u>	<u>Title</u>	<u>Page</u>
1	INTRODUCTION	1-1
	1.1 Objectives and Scope of the Inspection	1-1
2	SITE BACKGROUND	2-1
3	ENVIRONMENTAL INVESTIGATION ACTIVITIES	3-1
	3.1 Site Conditions	3-1
	3.2 Sampling Activities	3-1
4	ENVIRONMENTAL INVESTIGATION RESULTS	4-1
	4.1 Soil Sampling PCBs	4-1
	4.2 Liquid Sampling PCBs	4-1
	4.3 Wipe Sampling PCBs	4-1
5	THREATS TO HUMAN HEALTH AND THE ENVIRONMENT.	5-1
6	CONCLUSIONS AND RECOMMENDATIONS	6-1
	6.1 Conclusions	6-1
	6.2 Recommendations	6-1
7	REFERENCES	7-1

List of Figures

<u>Figure</u>		<u>Page</u>
A	Site Map	A-1
B	Site Sampling Locations Map	B-1

List of Tables

<u>Table</u>		<u>Page</u>
1	PCB Soil/Water/Wipe Analytical Data	4-1

List of Appendices

Appendice

A	Site Photographs
B	Analytical Data

SECTION 1
INTRODUCTION

SECTION 1

INTRODUCTION

On 31 October 2002, The United States Environmental Protection Agency (U.S. EPA) was requested by the Michigan Department of Environmental Quality (MDEQ) to conduct a Polychlorinated Biphenyl (PCB) assessment of the Former Statler Hilton Hotel (Figure 1, Site Location Map), located at 1539-1565 Washington Avenue, Detroit, Michigan 48226-1711(42:20:7.764N, 83:03:5.681W). U.S. EPA tasked Weston Solutions, Inc., (WESTON®) Superfund Technical Assessment and Response Team (START) to conduct the site assessment.

1.1 OBJECTIVES AND SCOPE OF THE INSPECTION

The objective of the Former Statler Hilton Hotel Site assessment was to determine the extent of PCB contamination in the structure from leaking PCB oil-containing transformers. MDEQ documented that the contents of the transformers had spread throughout the basement and fourth floor of the structure as a result of a direct release and interior flooding. The scope of the inspection was to collect samples from locations at the site that would confirm the presence of PCBs at levels which would indicate an immediate threat to the health, safety and welfare of the immediate population.

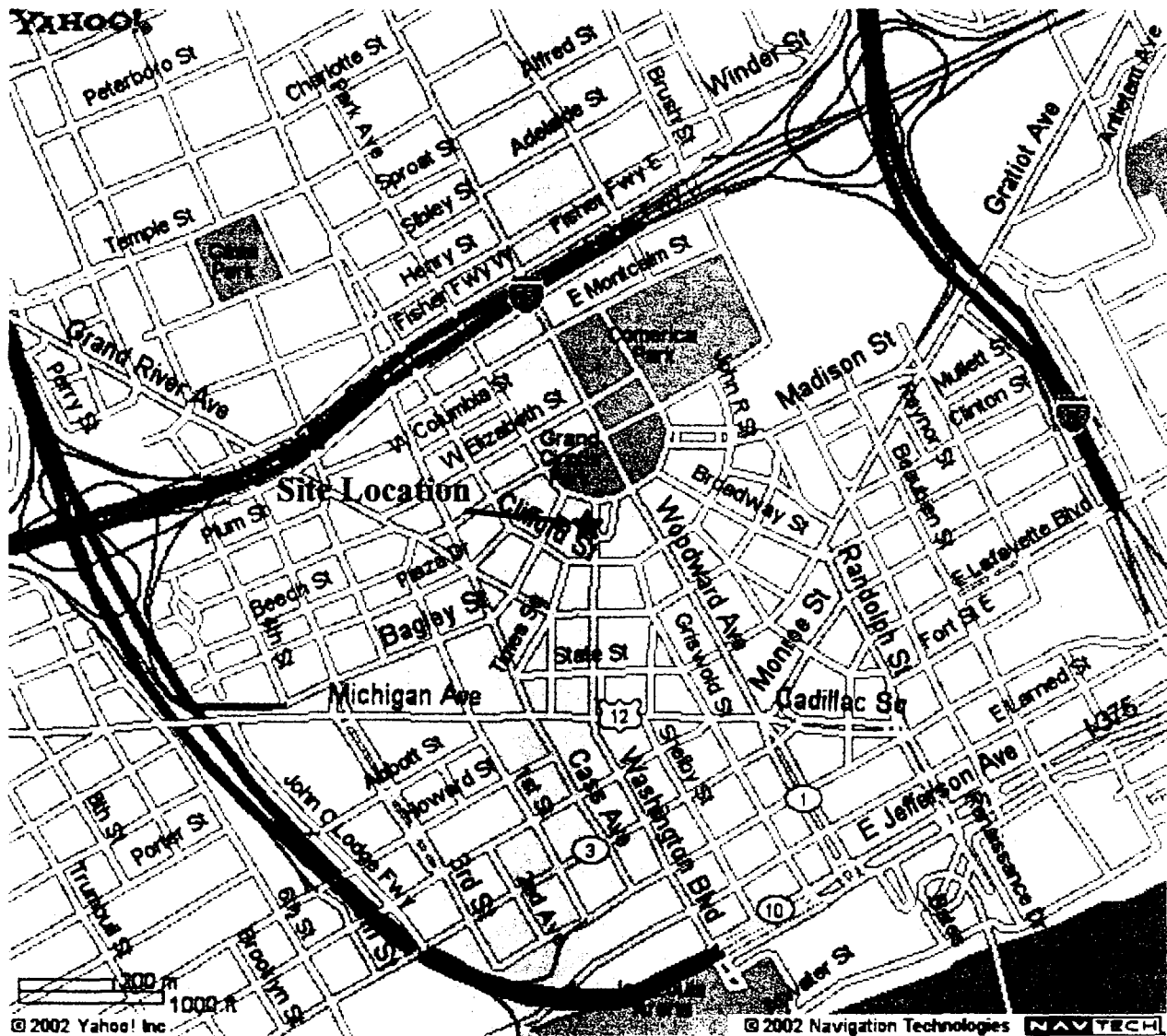
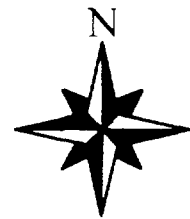


FIGURE-1
SITE LOCATION MAP

NOT TO SCALE

SECTION 2
SITE BACKGROUND

SECTION 2

SITE BACKGROUND

The Former Statler Hilton Hotel Site is located at the corner of the Grand Circus traffic circle and 1539-1565 Washington Avenue, Detroit, Michigan 48226-1711. The site is located directly south of Grand Circus Park, and southwest of Comerica Park. The site was constructed in the early 1900's by hotel developer E.M. Statler. The hotel closed in 1975 and was turned over to the City of Detroit in 1979 for foreclosure after the owner (Detroit Hilton Limited Partnership) could not pay back taxes. The items at the site of monetary value were sold by auction and the hotel remained in a derelict condition for approximately 25 years. In 2000, MDEQ commenced asbestos abatement and debris removal from the site. Near completion of this cleanup phase, MDEQ discovered the presence of several transformer carcasses in the basement and fourth floor of the site. MDEQ conducted PCB sampling of the areas around the transformer carcasses. Laboratory analytical results confirmed the presence of PCBs at concentrations as high as 480,000 ug from a wipe sample (MDEQ, 16 August 2002). MDEQ had completely exhausted its funding for cleanup activities at the site when the PCB analytical results were presented. MDEQ reviewed the PCB analytical data and then requested the assistance of the U.S. EPA to initiate and finish the site PCB cleanup activities.

SECTION 3

ENVIRONMENTAL INVESTIGATION ACTIVITIES

SECTION 3

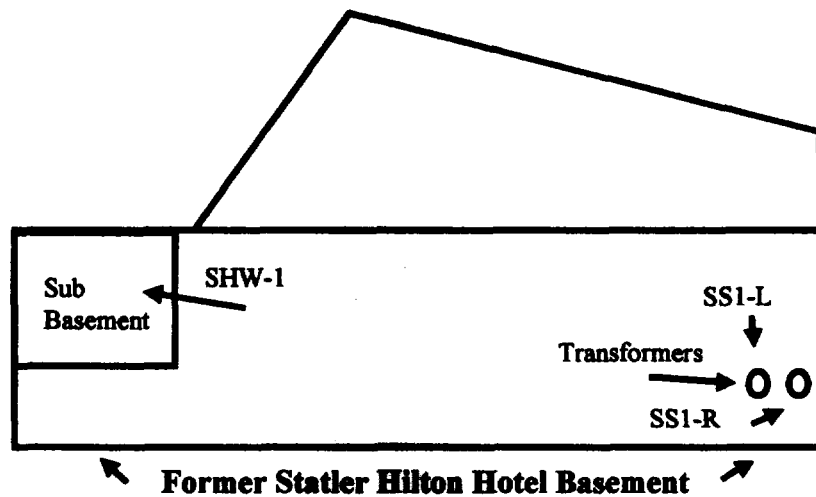
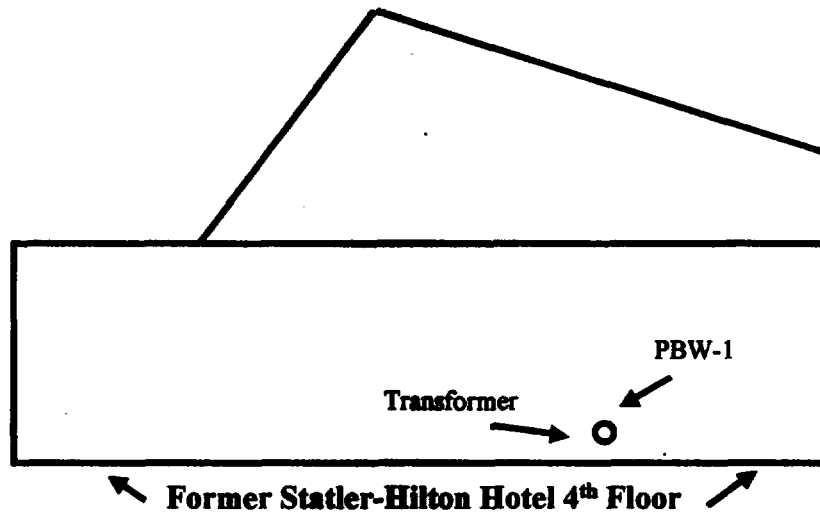
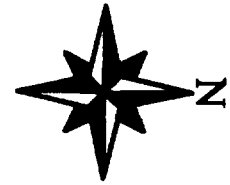
ENVIRONMENTAL INVESTIGATION ACTIVITIES

3.1 SITE CONDITIONS

The weather conditions at the site during the U.S. EPA investigation were cloudy, cool, with a light breeze, and 42 degrees Fahrenheit. The structure on the site was in fair condition and clear of debris and water due to the recent MDEQ cleanup operation. The floor surfaces were dry with the exception of the northeast side of the basement floor where water was located beneath the two transformer carcasses. The nine 100-gallon capacity transformer carcasses located in the basement of the northeast side of the structure had been stripped and their contents (PCBs) were presumed to have leaked onto the floor around the transformers. The sub-basement had approximately 6 inches of standing water with green biological matter on the surface. The water beneath the biological matter was clear and had no odor. The fourth floor 25-gallon transformer carcass was empty and laying on its side on the floor. Oil from the transformer had soaked into the concrete floor. The dust on the surface of the floor was presumed to have been stained as a result of oil leaking from the transformer carcass. A smokestack containing asbestos was located on the south side of the site (Appendix A). The smoke stack was unsecured with numerous holes and a cut out section at the bottom of the stack.

3.2 SAMPLING ACTIVITIES

U.S. EPA and START conducted multimedia sampling with an approved sampling plan at sampling locations selected by the On-Scene-Coordinator (OSC), (Figure 2, Sampling Location Map). The OSC selected sample locations that had been previously investigated to confirm the presence of PCBs and to determine if the PCBs were present at levels that posed a threat to the health, safety,



Washington Avenue

Grand Circus

FIGURE 2

SAMPLING LOCATION MAP

NOT TO SCALE

and welfare of immediate populations. Solid samples were collected from solids on the floor around the base of the two stripped transformers (SS1-L, SS1-R) located on the northeast side of the basement. Solid samples were collected utilizing disposable plastic trowels and 4-ounce clear wide mouth (CWM) jars. The solid samples were placed into the jars, sealed, and labeled. The water sample (SHW-1) was collected in the sub-basement by submerging a 4-ounce CWM jar into the water surface. The water sample was sealed and labeled. The wipe sample (PBW-1) was collected by wiping laboratory gauze within a precut 10 centimeter by 10 centimeter template. The wipe sample was placed into a sample jar provided by the laboratory, sealed, and labeled. All sampling, field, and shipment activities were conducted in adherence to Weston Solutions Inc., Standard Operating Procedures (SOPs), and the samples were sent to Clayton Laboratories in Novi, Michigan for PCB analyses.

SECTION 4

ENVIRONMENTAL INVESTIGATION RESULTS

SECTION 4

ENVIRONMENTAL INVESTIGATION RESULTS

4.1 SOLID SAMPLING PCBS

Laboratory analytical results from the 31 October 2002 sampling event indicated the presence of PCBs in the solids (Sample# SS1-R) as high as 3,400,000 ug/Kg (Table 1).

4.2 LIQUID SAMPLING PCBS

Laboratory analytical results from the 31 October 2002 sampling event indicated the presence of PCBs in the sub-basement water (Sample# SHW-1) at 0.25 ug/L (Table 1).

4.3 WIPE SAMPLING PCBS

Laboratory analytical results from the 31 October 2002 sampling event indicated the presence of PCBs in the wipe sample (Sample# PBW-1) at 280 ug/wipe (Table 1).

Table-1 Analytical Results

Sample Type	Sample Identification	Concentration	Reporting Limit	Analyses	EPA Method
Solid/Debris	SS1-R	3,400,000 ug/kg	220,000 ug/Kg	Aroclor 1260	8082
Solid/Debris	SS1-L	3,200,000 ug/kg	220,000 ug/Kg	Aroclor 1260	8082
Wipe	PBW-1	280 ug	20 ug	Aroclor 1260	8082
Water	SHW-1	0.25 ug/L	0.10 ug/L	Aroclor 1260	8082

SS1-L = Solid/Debris Sample Left #1, SS1-R = Solid/Debris Sample Right #1, PBW-1 = Wipe Sample #1,

SHW-1 = Water Sample #1

ug/kg = Micrograms per kilogram ug/L = Micrograms per liter

Note: QA/QC final results were corrected to represent "dry weight"

SECTION 5

THREATS TO HUMAN HEALTH AND THE ENVIRONMENT

SECTION 5

THREATS TO HUMAN HEALTH AND THE ENVIRONMENT

Conditions present on the Former Statler Hilton Hotel Site that warrant an appropriate removal action as set forth in paragraph (b)(2) of 40 CFR Part 300.415 of the National Oil and Hazardous Substances Contingency Plan (NCP) include the following:

1. **Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.**

The Former Statler Hilton Hotel Site is not secure. Holes in the ground grate in the rear of the structure confirmed that homeless individuals had gained unauthorized access to the basement.

2. **Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.**

There are nine 100-gallon stripped PCB transformer carcasses in the basement, and one 25-gallon transformer carcass on the 4th floor in the structure. Laboratory analytical results of the multimedia samples collected from two of these transformer locations confirmed the presence of PCBs.

3. **Other situations or factors that may pose threats to public health or welfare of the United States or the environment.**

The smokestack on the south side of the site has numerous holes in its side, and a large cut out section at the bottom. The cut out section is large enough for entry and exit by unauthorized individuals. The smokestack contains asbestos which under the right conditions could generate asbestos airborne particulate. This asbestos particulate could migrate offsite affecting the local human population. The asbestos situation should be further investigated by local health or state agencies.

SECTION 6

CONCLUSIONS AND RECOMMENDATIONS

SECTION 6

CONCLUSIONS AND RECOMMENDATIONS

6.1 CONCLUSIONS

Elevated PCB levels in the solids/debris, water, and wipe sample analytical results indicate that a threat to human health and welfare exists. According to the Code of Federal Regulations 40 CFR 761.125(3), sample areas containing PCBs at concentrations exceeding 10 ug/wipe are considered potential cleanup areas (DLZ, 21 June 2002).

6.2 RECOMMENDATIONS

START recommends that U.S. EPA commence PCB removal activities in the basement and fourth floor of the Former Statler Hilton Hotel Site to prevent further contamination of the structure. Additional sampling is recommended to delineate the extent of PCB contamination in the structure and the surrounding community.

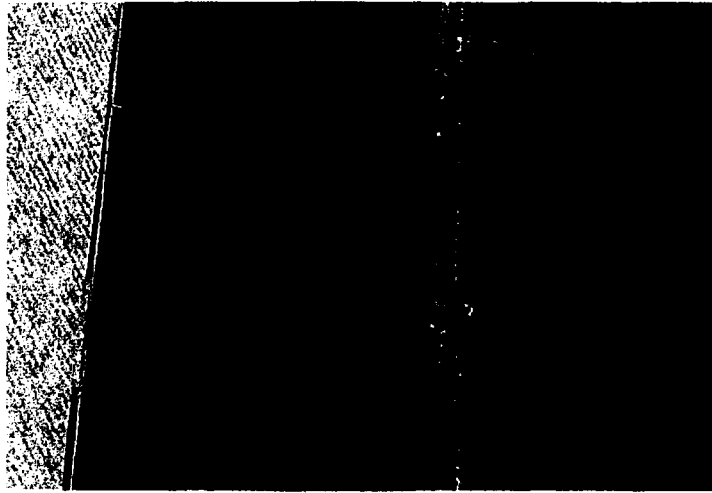
SECTION 7
REFERENCES

SECTION 7

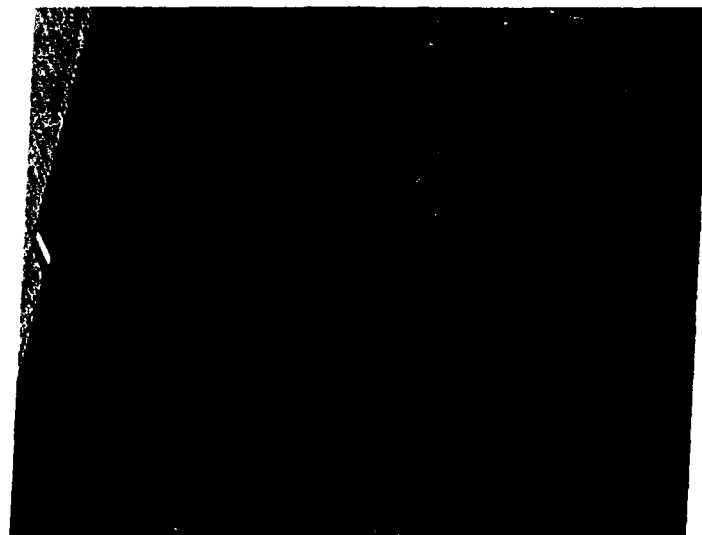
REFERENCES

1. DLZ, PCB Samples, Former Statler Hilton Site, Lansing, Michigan. 21 June 2002.
2. MDEQ, Former Statler Hilton Hotel, 1539-1565 Washington Ave, Detroit, Michigan. 16 August 2002.
3. Analytical Data, Clayton Group Services (W.O. 0210156), Novi, Michigan. 11 November 2002.

APPENDICE A



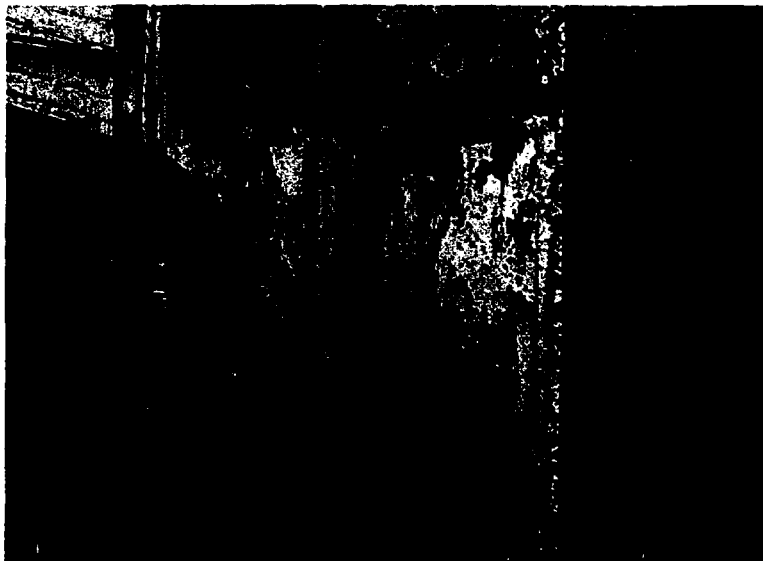
Smoke Stack on South Side of Site with holes in side.
Date: 31 October, 2002 Photographer: START



Smoke Stack on South Side of Site with holes in side.
Date: 31 October, 2002 Photographer: START



Smoke Stack on South Side of Site with holes in side.
Date: 31 October, 2002 Photographer: START



Smoke Stack on South Side of Site with cut hole in side.
Date: 31 October, 2002 Photographer: START



Wide angle view of top of smoke stack on south side of site.

Date: 31 October, 2002 Photographer: START



Sample location PBW-1 on the 4th floor of the site.

Date: 31 October, 2002 Photographer: START



Stripped transformer sample location SS1-R in basement..

Date: 31 October, 2002 Photographer: START



Stripped transformer sample location SS1-L in basement..

Date: 31 October, 2002 Photographer: START

APPENDICE B

**FORMER STATLER HILTON HOTEL SITE
DETROIT, MICHIGAN
DATA VALIDATION**

Clayton Group Services
Clayton Work Order # 02101156

TCLP RCRA Metals by SW 846 Methods 1311/6010 and 1311/7470A

1.

<u>Samples</u>	<u>Lab ID</u>	<u>Matrix</u>	<u>Date Collected</u>	<u>Date Extract</u>	<u>Date Analyzed</u>
SS1-R	02101156-001	Soil	10/31/02	-	11/4/02
SS1-L	02101156-002	Soil	10/31/02	-	11/4/02
SHW-1	02101156-003	Aqueous	10/31/02	-	11/4/02
PBW-1	02101156-004	Wipe	10/31/02	-	11/4/02

2. Holding Times and Sample Receipt

All samples were analyzed within the required holding time.

3. Blanks

The method blanks associated with these samples were free of contamination.

4. Matrix Spike/Matrix Spike Duplicate

Sample SS1-R was used for the matrix spike/matrix spike duplicate audit. The Aroclor 1016 matrix spike recovery (0%) and matrix spike duplicate recovery (0%) were outside the quality control limits. Therefore, qualify the Aroclor 1016 results in sample SS1-R as estimated (J/UJ).

5. Laboratory Control Samples

All laboratory control sample results were acceptable.

6. Surrogates

Surrogate recoveries for samples SS1-R, SS1-L and PBW-1 were diluted out. Surrogate recoveries for sample SHW-1 were acceptable.

L. Korabek 11/25/02

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654



November 11, 2002

Linda Korobka
WESTON SOLUTIONS OF MICHIGAN INC.
2501 Jolly Road
Suite 100
Okemos, MI 48864-

Clayton Work Order No. 02101156

Reference: Statler Hilton Hotel Site

Dear Linda Korobka:

Clayton Group Services received 4 samples on 10/31/2002 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record, acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

A handwritten signature in cursive script that reads "Karen Coonan".

Karen Coonan
Client Services Representative
cc: Ray Moffett

RECEIVED

NOV 14 2002

**Roy F. Weston, Inc.
of Michigan**

CASE NARRATIVE

Date: 11-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN INC.

Project: Statler Hilton Hotel Site

Work Order No 02101156

Analytical comments:

The Clayton Novi Laboratory is NELAP and AIHA accredited. These accreditations require that we provide the following information on each report: As an analytical result progresses above the reporting limit (RL), it has less variability than a result reported at, or near, the RL.

Analytical Comments for Method 8082WIPE, sample -004A: The Reporting Limit has been elevated - a dilution was required due to the high concentration of Aroclor 1260

Analytical Comments for Method 8082S, sample-001A, sample-001AMS, sample-001AMSD, sample -002A: The Reporting Limit has been raised due to the large concentration of Aroclor 1260 present in the samples. Please note that the surrogate standard recoveries were diluted out due to high amount of Aroclor 1260 present.

Sample-001AMS, sample-001AMSD: The percent recovery for Aroclor 1016 could not be reported, due to the compound being diluted out; the percent recovery for Aroclor 1260 is outside of the statistical limits, due to sample matrix.

Analytical Results
for

WESTON SOLUTIONS OF MICHIGAN INC.

Clayton Work Order No.: 02101156

Client Reference: Statler Hilton Hotel Site

Client ID: PBW-1
Lab ID: 004A
Matrix: Wipe

Date Sampled: 10/31/2002
Date Received: 10/31/2002
Air Vol.(L): NA

Analyte	Concentration		Reporting Limit (µg)	Test Method	Date Analyzed/Analyst	
	(µg)	(mg/m ³)				
Aroclor 1016	<20	--	20	EPA 8082	11/04/2002	PKT
Aroclor 1221	<20	--	20	EPA 8082	11/04/2002	PKT
Aroclor 1232	<20	--	20	EPA 8082	11/04/2002	PKT
Aroclor 1242	<20	--	20	EPA 8082	11/04/2002	PKT
Aroclor 1248	<20	--	20	EPA 8082	11/04/2002	PKT
Aroclor 1254	<20	--	20	EPA 8082	11/04/2002	PKT
Aroclor 1260	280	--	20	EPA 8082	11/04/2002	PKT

General Notes:

<: Less than the indicated reporting limit (RL).

--: Information not available or not applicable.

Handwritten:
11/22/02

ANALYTICAL RESULTS

Date: 11-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN INC.

Client Sample ID: SS1-R

Work Order No: 02101156

Tag Number:

Project: Statler Hilton Hotel Site

Collection Date: 10/31/2002

Lab ID: 02101156-001A

Matrix: SOIL

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
PCBS BY GC; METHOD EPA 8082						Analyst: PKT
Aroclor 1016	ND	220,000		µg/Kg-dry	500	11/04/2002
Aroclor 1221	ND	220,000		µg/Kg-dry	500	11/04/2002
Aroclor 1232	ND	220,000		µg/Kg-dry	500	11/04/2002
Aroclor 1242	ND	220,000		µg/Kg-dry	500	11/04/2002
Aroclor 1248	ND	220,000		µg/Kg-dry	500	11/04/2002
Aroclor 1254	ND	220,000		µg/Kg-dry	500	11/04/2002
Aroclor 1260	3,400,000	220,000		µg/Kg-dry	500	11/04/2002
ASTM D2216						Analyst: BDB
Percent Moisture	26	0		wt%	1	11/01/2002

L. Krueh
11/22/02

Qualifiers: ND - Not Detected at the Reporting Limit (RL).

J - Analyte detected below the Reporting Limit

B - Analyte detected in the associated Method Blank

* - Value exceeds Maximum Contaminant Level

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

T - Tentatively Identified Compound (TIC)

ANALYTICAL RESULTS

Date: 11-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN INC.

Client Sample ID: SS1-L

Work Order No: 02101156

Tag Number:

Project: Statler Hilton Hotel Site

Collection Date: 10/31/2002

Lab ID: 02101156-002A

Matrix: SOIL

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
PCBS BY GC; METHOD EPA 8082						Analyst: PKT
Aroclor 1016	ND	240,000		µg/Kg-dry	500	11/04/2002
Aroclor 1221	ND	240,000		µg/Kg-dry	500	11/04/2002
Aroclor 1232	ND	240,000		µg/Kg-dry	500	11/04/2002
Aroclor 1242	ND	240,000		µg/Kg-dry	500	11/04/2002
Aroclor 1248	ND	240,000		µg/Kg-dry	500	11/04/2002
Aroclor 1254	ND	240,000		µg/Kg-dry	500	11/04/2002
Aroclor 1260	3,200,000	240,000		µg/Kg-dry	500	11/04/2002
ASTM D2216						Analyst: BDB
Percent Moisture	31	0		wt%	1	11/01/2002

Z. Korabel
11/22/02

Qualifiers:
 ND - Not Detected at the Reporting Limit (RL).
 J - Analyte detected below the Reporting Limit
 B - Analyte detected in the associated Method Blank
 * - Value exceeds Maximum Contaminant Level

S - Spike Recovery outside accepted recovery limits
 R - RPD outside accepted recovery limits
 E - Value above quantitation range
 T - Tentatively Identified Compound (TIC)

ANALYTICAL RESULTS

Date: 11-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN INC.

Client Sample ID: SHW-1

Work Order No: 02101156

Tag Number:

Project: Statler Hilton Hotel Site

Collection Date: 10/31/2002

Lab ID: 02101156-003A

Matrix: AQUEOUS

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
PCBS BY GC; METHOD EPA 8082						Analyst: PKT
Aroclor 1016	ND	0.10		µg/L	1	11/04/2002
Aroclor 1221	ND	0.10		µg/L	1	11/04/2002
Aroclor 1232	ND	0.10		µg/L	1	11/04/2002
Aroclor 1242	ND	0.10		µg/L	1	11/04/2002
Aroclor 1248	ND	0.10		µg/L	1	11/04/2002
Aroclor 1254	ND	0.10		µg/L	1	11/04/2002
Aroclor 1260	0.25	0.10		µg/L	1	11/04/2002

g. krue
11/22/02

Qualifiers: ND - Not Detected at the Reporting Limit (RL).

J - Analyte detected below the Reporting Limit

B - Analyte detected in the associated Method Blank

* - Value exceeds Maximum Contaminant Level

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

T - Tentatively Identified Compound (TIC)

CLIENT: WESTON SOLUTIONS OF MICHIGAN I
Work Order: 02101156
Project:

QC SUMMARY REPORT

Laboratory Control Spike

Sample ID: LCS-8237	Batch ID: 8237	Test Code: 8082WIPE	Units: µg	Analysis Date: 11/04/2002				Prep Date: 10/31/2002			
Client ID:	Run ID: PP_HP3C_021104A				SeqNo: 342696						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	0.929	1	1	0	92.9	63.3	131	0			J
Aroclor 1260	0.91	1	1	0	91	72	112	0			J

Sample ID: LCSD-8237	Batch ID: 8237	Test Code: 8082WIPE	Units: µg	Analysis Date: 11/04/2002	Prep Date: 10/31/2002						
Client ID:	Run ID: PP_HP3C_021104A	SeqNo: 342698									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	0.886	1	1	0	88.6	63.3	131	0.929	4.74	23.7	J
Aroclor 1280	0.878	1	1	0	87.8	72	112	0.91	3.58	9.14	J

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit

S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: 11-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN I

Work Order: 02101156

Project:

QC SUMMARY REPORT

Laboratory Control Spike

Sample ID: LCS-8273		Batch ID: 8273		Test Code: 8082S		Units: µg/Kg		Analysis Date: 11/04/2002		Prep Date: 11/01/2002	
Client ID:		Run ID: PP_HP3C_021104A				SeqNo: 342700					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	315.3	330	333	0	94.7	30.1	149	0			J
Aroclor 1260	355	330	333	0	107	33	158	0			
Surr: Decachlorobiphenyl	19.7	0	16.7	0	118	36.3	187	0			
Surr: Tetrachloro-m-xylene	12.13	0	16.7	0	72.7	14.2	142	0			

Sample ID: LCS-8239	Batch ID: 8239	Test Code: 8082W	Units: µg/L	Analysis Date: 11/04/2002	Prep Date: 11/01/2002						
Client ID:	Run ID: PP_HP3C_021104A	SeqNo: 342678									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	0.739	0.1	1	0	73.9	22	127	0			
Aroclor 1260	0.799	0.1	1	0	79.9	33.4	132	0			
Surr: Decachlorobiphenyl	0.0276	0	0.05	0	55.2	25.6	145	0			
Surr: Tetrachloro-m-xylene	0.0158	0	0.05	0	31.6	0.362	109	0			

Sample ID: LCSD-8239	Batch ID: 8239	Test Code: 8082W	Units: µg/L	Analysis Date: 11/04/2002	Prep Date: 11/01/2002						
Client ID:	Run ID: PP_HP3C_021104A	SeqNo: 342681									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	0.68	0.1	1	0	68	22	127	0.739	8.32	56.3	
Aroclor 1260	0.795	0.1	1	0	79.5	33.4	132	0.799	0.502	41.9	
Surr: Decachlorobiphenyl	0.0285	0	0.05	0	57	25.6	145	0.0276	3.21	40.2	
Surr: Tetrachloro-m-xylene	0.0153	0	0.05	0	30.6	0.362	109	0.0158	3.22	48.3	

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit

S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: 11-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN I

Work Order: 02101156

Project:

QC SUMMARY REPORT

Sample Matrix Spike

Sample ID: 02101156-001AMS		Batch ID: 8273		Test Code: 8082S		Units: µg/Kg-dry		Analysis Date: 11/04/2002		Prep Date: 11/01/2002	
Client ID: SS1-R		Run ID: PP_HP3C_021104A				SeqNo: 342702					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	220000	450	0	0	5.24	156	0			S
Aroclor 1260	4595000	220000	450	3378000	270000	11.6	175	0			S
Surr: Decachlorobiphenyl	ND	0	22.57	0	0	36.3	187	0			S
Surr: Tetrachloro-m-xylene	ND	0	22.57	0	0	14.2	142	0			S

Sample ID: 02101156-001AMSD		Batch ID: 8273		Test Code: 8082S		Units: µg/Kg-dry		Analysis Date: 11/04/2002		Prep Date: 11/01/2002	
Client ID: SS1-R		Run ID: PP_HP3C_021104A				SeqNo: 342703					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	220000	450	0	0	5.24	156	0	0	55.9	S
Aroclor 1260	5203000	220000	450	3378000	405000	11.6	175	4595000	12.4	71.5	S
Surr: Decachlorobiphenyl	ND	0	22.57	0	0	36.3	187	0	0	0	S
Surr: Tetrachloro-m-xylene	ND	0	22.57	0	0	14.2	142	0	0	0	S

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit

S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: 11-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN I

Work Order: 02101156

Project:

QC SUMMARY REPORT

Method Blank

Sample ID: MB-8273		Batch ID: 8273		Test Code: 8082S		Units: µg/Kg		Analysis Date: 11/04/2002		Prep Date: 11/01/2002	
Client ID:		Run ID: PP_HP3C_021104A				SeqNo: 342699					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	330									
Aroclor 1221	ND	330									
Aroclor 1232	ND	330									
Aroclor 1242	ND	330									
Aroclor 1248	ND	330									
Aroclor 1254	ND	330									
Aroclor 1260	ND	330									
Surr: Decachlorobiphenyl	18.17	0	16.7	0	109	36.3	187	0			
Surr: Tetrachloro-m-xylene	12	0	16.7	0	71.9	14.2	142	0			

Sample ID: MB-8239		Batch ID: 8239		Test Code: 8082W		Units: µg/L		Analysis Date: 11/04/2002		Prep Date: 11/01/2002	
Client ID:		Run ID: PP_HP3C_021104A				SeqNo: 342677					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	0.1									
Aroclor 1221	ND	0.1									
Aroclor 1232	ND	0.1									
Aroclor 1242	ND	0.1									
Aroclor 1248	ND	0.1									
Aroclor 1254	ND	0.1									
Aroclor 1260	ND	0.1									
Surr: Decachlorobiphenyl	0.028	0	0.05	0	56	25.6	145	0			
Surr: Tetrachloro-m-xylene	0.022	0	0.05	0	44	0.362	109	0			

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit

S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

CLIENT: WESTON SOLUTIONS OF MICHIGAN I

Work Order: 02101156

Project:

QC SUMMARY REPORT

Method Blank

Sample ID: MB-8237		Batch ID: 8237		Test Code: 8082WIPE		Units: µg		Analysis Date: 11/04/2002		Prep Date: 10/31/2002	
Client ID:		Run ID: PP_HP3C_021104A				SeqNo: 342695					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	1									
Aroclor 1221	ND	1									
Aroclor 1232	ND	1									
Aroclor 1242	ND	1									
Aroclor 1248	ND	1									
Aroclor 1254	ND	1									
Aroclor 1260	ND	1									

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit

S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank



02101156

9/97 20K

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CLAYTON LABORATORY SERVICES

Detroit Regional Office
22345 Rosethal Drive
P.O. Box 8022
Novi, MI 48375

LABORATORY TRANSMITTAL COVER SHEET

(248) 344-1770

TO: Linda Korobka

Fax (248) 344-2633

FROM: Karen CoomeDATE: 11/21/02FAX NO: 517-381-592110 Pages after Transmittal Form

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided above.

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654



November 21, 2002

Linda Korobka
WESTON SOLUTIONS OF MICHIGAN INC.
2501 Jolly Road
Suite 100
Okemos, MI 48864

Clayton Work Order No. 02101156

Reference: Statler Hilton Hotel Site

Dear Ms. Korobka:

Enclosed please find the Case Narrative and the batch Quality Control Report for work order no. 02101156. The Case Narrative now includes a note regarding the surrogate recoveries for sample -004A. The Quality Control Report includes the surrogate information for the wine and water samples.

Please feel free to call (248) 344-2671 if you need any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Karen Coonan".

Karen Coonan
Laboratory Client Service Representative

Enclosure

**CASE NARRATIVE**

Date: 21-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN INC.**Project:** Statler Hilton Hotel Site**Work Order No** 02101156

Analytical comments:

The Clayton Novi Laboratory is NELAP and AIHA accredited. These accreditations require that we provide the following information on each report: As an analytical result progresses above the reporting limit (RL), it has less variability than a result reported at, or near, the RL.

Analytical Comments for Method 8082WIPE, sample -004A: The Reporting Limit has been elevated - a dilution was required due to the high concentration of Aroclor 1260. Please note that the surrogate standard recoveries were diluted out due to high amount of Aroclor 1260 present.

Analytical Comments for Method 8082S, sample-001A, sample-001AMS, sample-001AMSD, sample -002A: The Reporting Limit has been raised due to the large concentration of Aroclor 1260 present in the samples. Please note that the surrogate standard recoveries were diluted out due to high amount of Aroclor 1260 present.

Sample-001AMS, sample-001AMSD: The percent recovery for Aroclor 1016 could not be reported, due to the compound being diluted out; the percent recovery for Aroclor 1260 is outside of the statistical limits, due to sample matrix.

Clayton Group Services

Date: 21-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN I
Work Order: 02101156
Project: Statler Hilton Hotel Site
Test No: SW8081

**QC SUMMARY REPORT
SURROGATE RECOVERIES****PCBs; Water: Method 8082**

Sample ID	CL10BZ2	XYL2456CLM						
02101156-003A	67.2	24.0						
02101165-007C	28.8	63.6						
LCS-8239	55.2	31.6						
LCSD-8239	57.0	30.6						
MB-8239	56.0	44.0						

Acronym	Surrogate	QC Limits
CL10BZ2	= Decachlorobiphenyl	26.6-145
XYL2456CLM	= Tetrachloro-m-xylene	0.362-109

* Surrogate recovery outside acceptance limits

Clayton Group Services

Date: 21-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN I
Work Order: 02101156
Project: Statler Hilton Hotel Site
Test No: SW8081

**QC SUMMARY REPORT
SURROGATE RECOVERIES****PCBs on a Wipe by EPA 8082**

Sample ID	CL10BZ2	XYL2456CLM						
02101156-004A	0 *	0 *						
LCS-8237	95.2	60.4						
LCSD-8237	90.8	59.6						
MB-8237	94.0	53.2						

Acronym	Surrogate	QC Limits
CL10BZ2	= Decachlorobiphenyl	25.6-145
XYL2456CLM	= Tetrachloro-m-xylene	0.362-109

* Surrogate recovery outside acceptance limits

Clayton Group Services

Date: 21-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN I
Work Order: 02101156
Project: Statler Hilton Hotel Site
Test No: SW8081

**QC SUMMARY REPORT
SURROGATE RECOVERIES****PCBs; Soil: Method 8082**

Sample ID CL10BZ2 XYL2456CLM

02101156-001A	0 *	0 *						
02101156-001AMS	0 *	0 *						
02101156-001AMS	0 *	0 *						
02101156-002A	0 *	0 *						
LCS-8273	118	72.7						
MB-8273	109	71.9						

Acronym	Surrogate	QC Limits
CL10BZ2	= Decachlorobiphenyl	36.3-187
XYL2456CLM	= Tetrachloro-m-xylene	14.2-142

* Surrogate recovery outside acceptance limits

Clayton Group Services

Date: 21-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN I

Work Order: 02101156

Project: Statler Hilton Hotel Site

QC SUMMARY REPORT

Method Blank

Sample ID: MB-8273	Batch ID: 8273	Test Code: 8082S	Units: µg/Kg	Analysis Date: 11/04/2002	Prep Date: 11/01/2002						
Client ID:	Run ID: PP_HP3C_821184A	SeqNo: 342688									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	330									
Aroclor 1221	ND	330									
Aroclor 1232	ND	330									
Aroclor 1242	ND	330									
Aroclor 1248	ND	330									
Aroclor 1254	ND	330									
Aroclor 1260	ND	330									
Surr: Decachlorobiphenyl	18.17	0	18.7	0	108	38.3	187	0			
Surr: Tetrachloro-m-xylene	12	0	18.7	0	71.9	14.2	142	0			

Sample ID: MB-8239	Batch ID: 8239	Test Code: 8082W	Units: µg/L	Analysis Date: 11/04/2002	Prep Date: 11/01/2002						
Client ID:	Run ID: PP_HP3C_821104A	SeqNo: 342677									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	0.1									
Aroclor 1221	ND	0.1									
Aroclor 1232	ND	0.1									
Aroclor 1242	ND	0.1									
Aroclor 1248	ND	0.1									
Aroclor 1254	ND	0.1									
Aroclor 1260	ND	0.1									
Surr: Decachlorobiphenyl	0.028	0	0.05	0	56	25.6	145	0			
Surr: Tetrachloro-m-xylene	0.022	0	0.05	0	44	0.362	109	0			

Qualifiers: ND - Not Detected at the Reporting Limit

J - Analyte detected below Reporting Limit

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

CLIENT: WESTON SOLUTIONS OF MICHIGAN I
Work Order: 02101156
Project: Statler Hilton Hotel Site

QC SUMMARY REPORT

Method Blank

Sample ID: MEB-0237	Batch ID: 0237	Test Code: 0052NME	Units: pg	Analysis Date: 11/04/2002	Prep Date: 10/31/2002						
Client ID:	Run ID: PP_HP3C_021104A	SeqNo: 342005									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	1									
Aroclor 1221	ND	1									
Aroclor 1232	ND	1									
Aroclor 1242	ND	1									
Aroclor 1248	ND	1									
Aroclor 1254	ND	1									
Aroclor 1260	ND	1									
Sum: Decachlorobiphenyl	0.047	0	0.05	0	94	25.6	145	0			
Sum: Tetrachloro-m-xylene	0.0206	0	0.05	0	53.2	0.362	109	0			

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank
 J - Analyte detected below Reporting Limit R - RPD outside accepted recovery limits

Clayton Group Services

Date: 21-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN I

Work Order: 02101156

Project: Statler Hilton Hotel Site

QC SUMMARY REPORT

Laboratory Control Spike

Sample ID: LCS-8273	Batch ID: 8273	Test Code: 8082S	Units: ppb/Kg	Analysis Date: 11/04/2002	Prep Date: 11/01/2002						
Client ID:	Run ID: PP_HP3C_821104A	SeqNo: 342700									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	315.3	330	333	0	94.7	30.1	149	0			J
Aroclor 1260	355	330	333	0	107	33	158	0			
Surr: Decachlorobiphenyl	19.7	0	16.7	0	118	38.3	187	0			
Surr: Tetrachloro-m-xylene	12.13	0	16.7	0	72.7	14.2	142	0			

Sample ID: LCS-8230	Batch ID: 8230	Test Code: 8082W	Units: µg/L	Analysis Date: 11/04/2002	Prep Date: 11/01/2002						
Client ID:	Run ID: PP_HP3C_821104A	SeqNo: 342878									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	0.730	0.1	1	0	73.9	22	127	0			
Aroclor 1260	0.790	0.1	1	0	79.9	33.4	132	0			
Surr: Decachlorobiphenyl	0.0276	0	0.05	0	55.2	25.6	145	0			
Surr: Tetrachloro-m-xylene	0.0158	0	0.05	0	31.6	0.362	100	0			

Sample ID: LCS0-8230	Batch ID: 8230	Test Code: 8082W	Units: µg/L	Analysis Date: 11/04/2002	Prep Date: 11/01/2002						
Client ID:	Run ID: PP_HP3C_821104A	SeqNo: 342881									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	0.68	0.1	1	0	68	22	127	0.739	8.32	56.3	
Aroclor 1260	0.795	0.1	1	0	79.5	33.4	132	0.799	0.502	41.9	
Surr: Decachlorobiphenyl	0.0285	0	0.05	0	57	25.6	145	0.0276	3.21	40.2	
Surr: Tetrachloro-m-xylene	0.0153	0	0.05	0	30.6	0.362	109	0.0158	3.22	48.3	

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit

S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

CLIENT: WESTON SOLUTIONS OF MICHIGAN I
Work Order: 02101156
Project: Statler Hilton Hotel Site

QC SUMMARY REPORT
Laboratory Control Spike

Sample ID: LCS-8237	Batch ID: 8237	Test Code: 8082WIPE	Units: µg	Analysis Date: 11/04/2002	Prep Date: 10/31/2002						
Client ID:	Run ID: PP_HP3C_021104A	SeqNo: 342896									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	0.029	1	1	0	82.9	63.3	131	0			J
Aroclor 1260	0.91	1	1	0	91	72	112	0			J
Surr: Decachlorobiphenyl	0.0476	0	0.05	0	95.2	25.6	145	0			
Surr: Tetrachloro-m-xylene	0.0302	0	0.05	0	60.4	0.362	109	0			

Sample ID: LCSD-8237	Batch ID: 8237	Test Code: 8082WIPE	Units: µg	Analysis Date: 11/04/2002	Prep Date: 10/31/2002						
Client ID:	Run ID: PP_HP3C_021104A	SeqNo: 342896									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	0.888	1	1	0	88.8	63.3	131	0.029	4.74	23.7	J
Aroclor 1260	0.678	1	1	0	67.8	72	112	0.91	3.58	9.14	J
Surr: Decachlorobiphenyl	0.0454	0	0.05	0	90.8	25.6	145	0.0476	4.73	0	
Surr: Tetrachloro-m-xylene	0.0298	0	0.05	0	59.6	0.362	109	0.0302	1.33	0	

Qualifiers: ND - Not Detected at the Reporting Limit
 J - Analyte detected below Reporting Limit

S - Spike Recovery outside accepted recovery limits
 R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: 21-Nov-02

CLIENT: WESTON SOLUTIONS OF MICHIGAN I
 Work Order: 02101156
 Project: Statler Hilton Hotel Site

QC SUMMARY REPORT

Sample Matrix Spike

Sample ID: 02101156-001AMS	Batch ID: 8273	Test Code: 8882S	Units: µg/Kg-dry	Analysis Date: 11/04/2002	Prep Date: 11/01/2002						
Client ID: SS1-R	Run ID: PP_HP3C_021104A	SeqNo: 342702									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	220000	450	0	0	5.24	156	0			S
Aroclor 1260	4505000	220000	450	3378000	270000	11.6	175	0			S
Surr: Decachlorobiphenyl	ND	0	22.57	0	0	36.3	187	0			S
Surr: Tetrachloro-m-xylene	ND	0	22.57	0	0	14.2	142	0			S

Sample ID: 02101156-001AMSD	Batch ID: 8273	Test Code: 8882S	Units: µg/Kg-dry	Analysis Date: 11/04/2002	Prep Date: 11/01/2002						
Client ID: SS1-R	Run ID: PP_HP3C_021104A	SeqNo: 342703									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	220000	450	0	0	5.24	156	0	0	55.9	S
Aroclor 1260	5203000	220000	450	3378000	405000	11.6	175	4595000	12.4	71.5	S
Surr: Decachlorobiphenyl	ND	0	22.57	0	0	36.3	187	0	0	0	S
Surr: Tetrachloro-m-xylene	ND	0	22.57	0	0	14.2	142	0	0	0	S

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank
 J - Analyte detected below Reporting Limit R - RPD outside accepted recovery limits